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December 2, 2024

Via ECF

Hon. Allyne R. Ross
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 10007

Re: *United States v. Taesung Kim*
Docket No. 1:23-cr-00191-ARR

Dear Judge Ross:

As Your Honor is aware, I represent Mr. Kim, who was originally arraigned in this matter on May 2, 2023, and released on bail conditions which included a secured bond, and customary travel restrictions. To date, Mr. Kim has been fully compliant with his terms of release.

I am writing to respectfully request a temporary modification of Kim's terms of release. Mr. Kim's son is graduating from the United States Navy Pilot School in Pensacola, Florida on January 17, 2025. With this, Mr. Kim seeks to travel with his family from New York to Florida on January 15, 2025, and returning on January 19, 2025. Accordingly, I respectfully request that Mr. Kim be permitted to travel on those dates for this purpose.

I have conferred with AUSA Patrick J. Campbell, who offers his consent to this application.

Thank you for your consideration.

Very truly yours,

/s/ Kevin J. Keating

KEVIN J. KEATING

KJK/dg

cc: AUSA Patrick J. Campbell